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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

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UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON MICHAEL SHAMO, et. al.,

Defendant.

**NOTICE OF EXPERT  
DR. TERRI HADDIX**

Case No. 2:16-CR-00631 DAK

Judge Dale A. Kimball

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The Defendant, Aaron Michael Shamo, through his counsel Gregory G. Skordas and Kaytlin V. Beckett, hereby gives notice of their intent to offer expert testimony through Dr. Terri Haddix.

The nature of that testimony is as follows: Dr. Haddix has reviewed the data and information provided with respect to Count 6 of the Second Superseding Indictment “(Death Resulting Count)”. Dr. Haddix is expected to provide testimony as to the causational elements of the Death Resulting Count as well as the specific information relating to the autopsy and forensic examination of R.K.

Dr. Haddix has not, as of the date of this notice, provided a final written report. As soon as one is available it will be made available to the Government. A copy of Dr. Haddix’s CV is

attached. Dr. Haddix is available through Defense Counsel to cooperatively consult with the Government.

DATED this 26<sup>th</sup> day of November, 2018.

SKORDAS, CASTON & HYDE, LLC

/s/ Gregory G. Skordas

Gregory G. Skordas  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on the 26<sup>th</sup> day of November, 2018, I filed a true and correct copy of the foregoing NOTICE OF EXPERT DR. TERRI HADDIX, with the Clerk of the Court using CM/ECF system, which sent notification of such filing to the following:

S. Michael Gadd  
mgadd@agutah.gov

Vernon G. Stejskal  
Vernon.stejskal@usdoj.gov

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/s/ Sabrina Nielsen-Legal Secretary  
Skordas, Caston & Hyde, LLC



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**TERRI L. HADDIX**  
**SENIOR FORENSIC PATHOLOGIST**  
*Curriculum Vitae*

**PROFESSIONAL EXPERIENCE**

Dr. Haddix has worked in the area of forensic pathology for over 20 years. She received forensic pathology training in Seattle, WA and neuropathology training at Stanford. She is board certified in anatomic, forensic and neuropathology. She has performed forensic autopsies in several counties throughout California and has testified as an expert in forensic pathology in both criminal and civil cases.

**LICENSURE**

- Washington, No. 26810
- California, No. G82165

**BOARD CERTIFICATION**

- Diplomate, American Board of Pathology
- Anatomic and Forensic Pathology, 9/1997
- Neuropathology, 9/2005

**FACULTY POSITIONS**

- 8/2012 – 10/2012: Clinical Associate Professor, Department of Pathology, Stanford University Medical Center, Stanford, CA
- 2006 - 2012: Clinical Assistant Professor, Department of Pathology, Stanford University Medical Center, Stanford, CA
- 2005 - 06: Clinical Instructor, Department of Pathology, Stanford University Medical Center, Stanford, CA
- 1999 - 2012: Assistant Clinical Professor (volunteer faculty), Department of Pathology, University of California, San Francisco, CA
- 1996 - 1997: Assistant Clinical Professor, Department of Pathology, University of California, San Diego, CA
- 1989 - 1990: Teaching Associate, Division of Cardiothoracic Surgery, University of Washington, Seattle, WA

**EDUCATION**

- 1979 - 1982: Major: Molecular, Cellular and Developmental Biology University of Colorado, Boulder, CO
- 1982 - 1983: BS, Biology, University of New Mexico, Albuquerque, NM

- 1983 - 1987: MD, graduation with honors, University of Colorado School of Medicine, Denver, CO

## **POSTGRADUATE TRAINING**

- 1987 - 1989: General Surgery Resident, University of Washington, Seattle, WA
- 1992 - 1994: Pathology Resident, University of Washington, Seattle, WA
- 1994 - 1995: Assistant Medical Examiner (Fellowship), King County Medical Examiner's Office, Seattle, WA
- 07/1995 - 12/1995: Washington State Forensic Pathology Specialist, University of Washington, Seattle, WA
- 2003 - 2005: Neuropathology Fellow, Stanford University, Stanford, CA

## **OTHER PROFESSIONAL EXPERIENCE**

- 12/2005 - : Forensic Pathologist, Forensic Analytical Crime Lab, Inc., Hayward, CA
- 10/1998 - 05/2003: Forensic Pathologist, San Mateo County, San Mateo, CA
- 11/1997 - 09/1998: Assistant Medical Examiner, San Francisco Medical Examiner's Office, San Francisco, CA
- 01/1996 - 10/1997: Deputy Medical Examiner, San Diego Medical Examiner's Office, San Diego, CA

## **LOCUM TENENS**

- 1999 - 2005: Monterey County Sheriff-Coroner's Office, Salinas, CA
- 2000 - 2010: San Luis Obispo County Sheriff-Coroner's Office, San Luis Obispo, CA
- 2000 - 2003: Santa Barbara County Sheriff-Coroner's Office, Santa Barbara, CA
- 2001 - 2002: San Joaquin County Sheriff-Coroner's Office, French Camp, CA
- 2002 - 2003: Western Laboratories Medical Group (contracted with Alameda County Sheriff-Coroner's Office), Oakland, CA
- 2003 - 2012: Santa Cruz County Sheriff-Coroner's Office, Santa Cruz, CA

## **PROFESSIONAL ACTIVITIES**

- **Memberships:**
  - 1995 - 2003: National Association of Medical Examiners
  - 1995 - : American Academy of Forensic Sciences  
Fellow status - 2017
  - 2001 - 2003: South Bay Pathology Society
  - 2014 - : Society of Forensic Engineers and Scientists
- **Committees:**
  - 1999 - 2003: San Mateo County Child Death Review Team

## RESEARCH EXPERIENCE

- 1990 - 1992: Research Fellow, Division of Cardiothoracic Surgery, University of Washington, Seattle, WA

## PUBLICATIONS:

### Journal Articles

1. Jack E, Fennelly NK, Haddix T. Leptomenigeal Inflammation in Infant and Fetal Deaths Without Trauma. *Inflammation and Cell Signalling* DOI 10.14800/ics.225. Epub 2014 Sep 11.
2. Jack E, Fennelly NK, Haddix T. The inflammatory cellular constituents of foetal and infant leptomeninges: a survey of hospital-based autopsies without trauma. *Childs Nervous System* DOI 10.1007/s00381-013-2348-5. Epub 2014 Jan 9.
3. Monje M, Mitra SS, Freret ME, Raveh TB, Kim J, Masek M, Attema JL, Li G, Haddix T, Edwards MS, Fisher PG, Weissman IL, Rowitch DH, Vogel H, Wong AJ, Beachy PA. Hedge-hog responsive candidate cell of origin for diffuse intrinsic pontine glioma. *Proc Natl Acad Sci USA*; 108(11): 4453-8, 2011. doi: 10.1073/pnas.1101657108. Epub 2011 Mar 1.
4. Uryu K, Haddix T, Robinson J, et al. Burden of neurodegenerative diseases in a cohort of medical examiners subjects. *J Forensic Sci* 55(3): 642-5, 2010.
5. Haddix T, Chang S, Vogel H. A Thirty-five year old with a Dural-based Mass. *Brain Pathol* 17(3): 331-2, 2007.
6. Morgan T, Zhao S, Chang K, Haddix T, Domanay E, Cornbleet P, Arber D, Natkunam Y. Low CD27 expression in plasma cell dyscrasias correlates with high risk disease: An immunohistochemical analysis. *Am J Clin Path* 126(4): 545-51, 2006.
7. Lim M, Haddix T, Harsh G, Vogel H, Steinberg GK, Guccione S. Characterization of the Integrin  $\alpha v \beta 3$  in Arteriovenous Malformations and Cavernous Malformations. *Cerebrovasc Dis* 20: 23-27, 2005.
8. Lim M, Guccione S, Haddix T, Sims L, Cheshier S, Chu P, Vogel H, Harsh GH. Avb3 Integin in Central Nervous System Tumors. *Hum Pathol* 36(6): 665-9, 2005.
9. Reed W, Walker P, Haddix T, Perkins HL. Acute anemic events in sickle cell disease. *Transfusion* 40: 267-73, 2000.
10. Sato TT, Kovacich JC, Boyle EM Jr, Haddix TL, Weintraub A, Pohlman TH. CD14-dependent activation of human endothelial cells by *Bacteroides fragilis* outer membrane. *J Surg Res* 74(2): 103-11, 1998.
11. Logan BK, Fligner CL, Haddix TL. Cause and manner of death in fatalities involving methamphetamine. *J Forensic Sci* 43(1): 28-34, 1998.

12. Haddix TL, Harruff RC, Reay DT, Haglund WD. Asphyxial suicides utilizing plastic bags. *Am J Forensic Med Pathol* 17(4): 308-11, 1996.
13. Haddix TL, Pohlman TH, Noel RF, Sato TT, Boyle EM Jr., Verrier ED. Hypothermia inhibits human E-selectin transcription. *J Surg Res* 64(2): 176-83, 1996.
14. Johnson M, Haddix T, Pohlman T, Verrier E. Hypothermia reversibly inhibits endothelial cell expression of E-selectin and tissue factor. *J Card Surg* 10 (Suppl): 428-35, 1995.
15. Deisher TA, Haddix TL, Montgomery KF, Pohlman TH, Kaushanski K, Harlan JM. Role of protein kinase C in the induction of VCAM-1 expression on human umbilical vein endothelial cells. *FEBS Lett* 331(3): 285-90, 1993.
16. Peterson VM, Moore EE, Jones TN, Rundus C, Emmett M, Moore FA, McCroskey BL, Haddix T, Parson PE. Total enteral nutrition versus total parenteral nutrition after major torso injury: attenuation of hepatic protein reprioritization. *Surgery* 104(2): 199-207, 1988.
17. Peterson VM, Murphy JR, Haddix TL, et al. Identification of novel prognostic indicators in burned patients. *J Trauma* 28(5): 632-7, 1988

#### Book Chapters

1. J-S Koh, U-K Chang and T. Haddix, "Extradural Benign Tumors," Chap. 1 in *Tumors of the Spine*, (Kim, Chang, Kim and Bilsky, Eds.), Saunders Elsevier, Philadelphia, 2008.
2. J-S Koh, U-K Chang and T. Haddix, "Cysts and Other Benign Lesions," Chap. 2 in *Tumors of the Spine*, (Kim, Chang, Kim and Bilsky, Eds.), Saunders Elsevier, Philadelphia, 2008.
3. J-S Koh, U-K Chang and T. Haddix, "Epidural Malignant Tumors," Chap. 3 in *Tumors of the Spine*, (Kim, Chang, Kim and Bilsky, Eds.), Saunders Elsevier, Philadelphia, 2008.
4. J-S Koh, U-K Chang and T. Haddix, "Intradural Extramedullary Benign Tumors," Chap. 4 in *Tumors of the Spine*, (Kim, Chang, Kim and Bilsky, Eds.), Saunders Elsevier, Philadelphia, 2008.
5. J-S Koh, U-K Chang and T. Haddix, "Intradural Extramedullary Cystic Lesions," Chap. 5 in *Tumors of the Spine*, (Kim, Chang, Kim and Bilsky, Eds.), Saunders Elsevier, Philadelphia, 2008.
6. J-S Koh, U-K Chang and T. Haddix, "Intradural Extramedullary Malignant Tumors," Chap. 6 in *Tumors of the Spine*, (Kim, Chang, Kim and Bilsky, Eds.), Saunders Elsevier, Philadelphia, 2008.
7. J-S Koh, U-K Chang and T. Haddix, "Intramedullary Tumors," Chap. 7 in *Tumors of the Spine*, (Kim, Chang, Kim and Bilsky, Eds.), Saunders Elsevier, Philadelphia, 2008.



**ABSTRACTS:**

1. Jack E., Haas E., Haddix T. Evaluation of the Presence and Distribution of Leptomeningeal Inflammation in Cases of Sudden Death in Infancy. Presented at 2016 (February) American Academy of Forensic Sciences meeting, Las Vegas, NV.
2. Jack E., Fennelly NK, Haddix T. The Inflammatory Cellular Constituents of Foetal and Infant Leptomeninges: a survey of hospital-based autopsies without trauma. Presented at British Neuropathological Society, February 2014.
3. Jack E, Fennelly NK, Haddix T. The Inflammatory Cellular Constituents of Foetal and Infant Leptomeninges: a survey of hospital-based autopsies without trauma. Presented at the Irish Society of Surgical Pathology, Cork, Ireland, October 2013.
4. Monje, M, Freret M, Kim, J, Masek, M, Mitra, S, Haddix T, Edwards M, Fisher P, Rowitch D, Vogel H, Beachy P. A hedgehog-responsive precursor of the childhood hindbrain as a candidate cell of origin for diffuse intrinsic pontine glioma. Presented at 2011 (April) American Academy of Neurology meeting, Honolulu, HI.
5. Haddix T, Monje M, Masek M, Freret M, Fisher P, Vogel H. Supratentorial Extension of Diffuse Intrinsic Pontine Glioma (DIPG). Presented at 2011 (June) American Association of Neuropathologists meeting, Seattle, WA.
6. Amato M, Kim A, Peak S, Cullen S, Lando M, Haddix T. Fibrosing infraorbital nerve process masking intracranial malignant peripheral nerve sheath tumor (MPNST). Presented at 2008 (November) American Society of Ophthalmic Plastic and Reconstructive Surgery, Atlanta, GA.
7. Miller CR, Haddix T, Dunham CP, Perry A. Clinical significance of prospective molecular genetic analysis of glial neoplasms: the Washington University FISH laboratory experience. Presented at 2007 (April) American Association of Neuropathology meeting, Washington, DC.
8. Haddix T, Recht L, Myles T, Leung L, Vogel H. Overexpression of osteopontin (OPN) in glioblastoma multiforme (GBM). Presented at 2005 (June) American Association of Neuropathology meeting, Arlington, VA.
9. Pate L, Haddix T, Vogel H. Glioblastoma with remote subcutaneous metastases. Presented at 2005 (June) American Association of Neuropathology meeting, Arlington, VA.
10. Lim M, Guccione S, Haddix T, Chu P, Vogel H, Steinberg G, Harsh G. Characterization of the integrin  $\alpha\beta3$  expression in arteriovenous malformations and cavernous malformations. Presented at 2005 (February) American Association of Neurological Surgeons meeting (vascular section), New Orleans, LA.
11. Lim M, Guccione S, Haddix T, Chu P, Vogel H, Steinberg G, Harsh G. Characterization of the integrin  $\alpha\beta3$  expression in arteriovenous malformations and cavernous malformations. Presented at 2005 Stroke meeting, New Orleans, LA.



12. Lim M, Guccione S, Haddix T, Chu P, Vogel H, Steinberg G, Harsh G. Characterization of the integrin  $\alpha v \beta 3$  expression in arteriovenous malformations and cavernous malformations. Presented at 2005 (April) American Association of Neurological Surgeons meeting, New Orleans, LA.
13. Lim M, Guccione S, Haddix T, Chu P, Vogel H, Harsh G. Role of the  $\alpha v \beta 3$  Integrins in Angiogenesis of CNS Tumors. Presented at 2004 Congress of Neurological Surgeons meeting, San Francisco, CA.
14. Haddix T, Prichard J, Warnke R, Vogel H. Primary Hodgkin's Disease in the brain of a HIV-positive adult. Presented at 2004 American Association of Neuropathologists annual meeting, Cleveland, OH.
15. Lim M, Guccione S, Haddix T, Homer R, Atlas S, Harsh G. Expression of  $\alpha v \beta 3$  integrin in Human Glioblastoma Multiforme. Presented at 2004 American Association of Neurological Surgeons, Orlando, FL.
16. Haddix TL, Symes SA. Atypical decomposition and power saw dismemberment. Presented at 2003 National Association of Medical Examiners annual meeting, San Jose, CA.
17. Haddix TL. Death associated with a portable infusion device. Presented at 2001 National Association of Medical Examiners annual meeting, Richmond, VA.
18. Logan BK, Fligner CL, Haddix TL. Cause and manner of death in fatalities involving methamphetamine. Presented at 1998 American Academy of Forensic Sciences annual meeting, San Francisco.
19. Logan BK, Fligner CL, Haddix TL. Methamphetamine fatalities in Washington state, 1993-1995: Interpretation of methamphetamine concentrations. Presented at 1997 American Academy of Forensic Sciences annual meeting, New York.
20. Haddix TL, Harruff RC, Reay DT, Haglund WD. Asphyxial suicides utilizing plastic bags. Presented at 1995 National Association of Medical Examiners annual meeting, San Diego.
21. Harruff RC, Reay DT, Haddix TL, Miller SR, Webster JN, Haglund WD. Correlation of collision dynamics with injuries in traffic fatalities. Presented at 1995 National Association of Medical Examiners annual meeting, San Diego.
22. Sato TT, Martin S, Haddix TL, Neil D, Weintraub A, Pohlman TH. Activation of endothelial leukocyte adhesion by *B. fragilis* outer membrane. Presented at the Scientific Session of the 71<sup>st</sup> Annual Meeting of the American College of Surgeons Committee on Trauma, San Diego, 1993.
23. Haddix TL, Montgomery KF, Pohlman TH, Verrier ED. Reversible inhibition of Endothelial Leukocyte Adhesion Molecule 1 (ELAM-1) expression in hypothermic endothelial cells. Presented at Clinical Congress of the American College of Surgeons, Chicago, 1991.

24. Peterson VM, Rundus C, Haddix T, Cherry D. Topical cerium nitrate enhances myelopoiesis in a mouse model of thermal injury. Presented at 1988 American Burn Association Meeting, Seattle.
25. Peterson VM, Emmett M, Murphy J, Gunther P, Ford P, Haddix T, Bartle E, Mancusi-Ungaro H. Serum group-specific component protein levels predict patient outcome following major thermal injuries. Presented at 1988 American Burn Association Meeting, Seattle.
26. Peterson VM, Moore EE, Jones TN, Rundus C, Moore F, McCroskey BL, Haddix TL, Emmett M, Parson PE. Total enteral nutrition versus total parenteral nutrition following major torso injury: Attenuation of hepatic protein reprioritization. Presented at 1988 Society of University Surgeons.